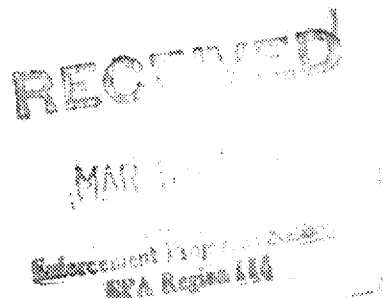




U. S. Steel  
Clairton Works  
400 State Street  
Clairton, PA 15025-1855

February 28, 1996

Mr. David B. McGuigan, Ph.D.  
Chief, Air Enforcement Section  
United States Environmental Protection Agency  
Region III  
841 Chestnut Building  
Philadelphia, PA 19107-4431



Subject: U.S. Steel Clairton Works  
Modifications and Improvements to Igniter Pilot Systems

Dear Mr. McGuigan:

Our September 15, 1995 submittal of our consultant's report enumerated the steps which we had taken to improve the reliability of our battery igniter flare system. It also listed additional changes which at that time were anticipated. The tasks identified in our submittal and the current status of those tasks are listed below:

- Install a revised size gas nozzle on one pilot (of three) of each of the flare stacks at the second unit batteries. Implementation was anticipated to be complete by November 15, 1995.

*Status:* The second unit gas nozzle replacement was completed by November 15, 1995.

- Install revised gas nozzles on all batteries. Implementation was anticipated to be complete by February 29, 1996.

*Status:* Revised gas nozzle replacement was completed on February 23, 1996.

- Additional pipe taps were to be installed on pilot lines to test air/fuel ratios. Implementation was anticipated to be complete by December 15, 1995.

*Status:* The pipe tap installation was completed by December 15, 1995.

All revisions and modifications have been completed. We anticipate that flare performance will continue to be good. Our recent performance is summarized below.



Month	Pilots out of Service (Hr:Min)	Online %*
September, 1995	00:00	100%
October, 1995	00:00	100%
November, 1995	00:00	100%
December, 1995	00:00	100%
January, 1996	00:55	99.99%

\*Based on hours flares were unavailable due to pilot problems versus battery operating hours.

We have now operated through the winter, which historically had been the problem time of year, with excellent performance. We experienced only one incident during January which was the result of a slow steam leak from a cleanout line into the ignitor pilot lines. The steam leak caused the line to freeze and choke off the pilot gas. This performance contrasts with the performance of the previous winter reported in our September 15 letter, when January's online percentage was 99.44% and February's was 99.94%. The excellent performance is the result of the significant efforts spent to improve the flare reliability.

If you have any questions, please call me at (412) 233-1101.

Sincerely,



H. R. McCollum

Manager, Environmental Control

HRM/bb-96057

cc: Michael Ioff  
Bill Gilson, ACHD



U. S. Steel  
Clairton Works  
400 State Street  
Clairton, PA 15025-1855

RECEIVED

February 29, 1996

Deputy Director  
Allegheny County Health Department  
Department of Air Quality  
301 Thirty-Ninth Street  
Pittsburgh, PA 15201

U.S. Environmental Protection Agency  
Region III  
Air, Radiation & Toxics Division  
841 Chestnut Building  
Philadelphia, PA 19107  
ATTN: Michael Ioff (3AT23)

Assistant Council  
Department of Environmental Resources  
Southwest Region  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745  
ATTN: Ward Kelsey, Esq.

Department of Justice  
Environmental and Natural Resource Division  
Environmental Enforcement Section  
P.O. Box 7611  
Ben Franklin Station  
Washington, D.C. 20044  
ATTN: David Street, Esq.

Subject: USS Reference Number: 96-0037  
Coke Oven Gas Flare Pilots  
USS Clairton Works

Gentlemen:

The attached form confirms our verbal report of the subject incident. Any questions concerning this matter should be referred to R. P. Spargal at 233-1486.

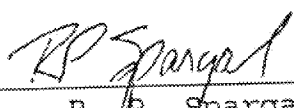
Very truly yours,

T. W. Goettge  
General Manager  
Coking Operations



NOTICE OF BREAKDOWN OF EQUIPMENT  
ARTICLE XXI - SECTION 2108.01

1. USS Reference Number: 96-0037
2. Date & Time of Breakdown: Date: 02/29/96 Time: 0010 hours
3. Company Name: USX Corporation - USS Clairton Works
4. Specific Equipment Involved or Affected: #13, 14, 15, 19, 20 Coke Oven Gas Flare Pilots
5. BAPC Permit Number (if applicable):
6. Location: Clairton, PA
7. Nature and cause of breakdown: The coke oven gas flare igniter pilots were out on #13, 14, 15, 19, 20 Batteries. A loss of air pressure occurred when an air supply line located at #7 Quench Tower broke. It is believed that an air operated butterfly valve which regulates the gas flow to the pilots drifted closed.
8. Identification of Emissions:
  - A. Type(s) (CO, NOX, SO2, Particulates, Hydrocarbons, etc.)  
No environmental impact.
  - B. Toxic qualities of each type (including its qualities as an irritant, and its potential for causing illness, disability, or mortality). Unknown.
  - C. Amount of each type emitted (or likely to be emitted).  
No environmental impact.
9. Measures taken (or to be taken) to minimize length of breakdown and amount of emissions, including shutdown or curtailment (or why it is impossible or impractical to do so).  
The coke oven gas flare pilots were re-lit.
10. Facility back in operation - Date: 02/29/96 Time: 0430 hours

Signature  Date 2/29/96  
R. P. Spargal  
Environmental Control Engineer Phone: 233-1467